

**Archived:** Friday, April 16, 2021 1:51:12 PM

**From:** Richard Sandza

**Sent:** Wed, 17 Feb 2021 20:20:24 +0000Received: from BN0PR04CA0195.namprd04.prod.outlook.com (2603:10b6:408:e9::20) by CH2PR19MB3895.namprd19.prod.outlook.com (2603:10b6:610:92::8) with Microsoft SMTP Server (version=TLS1\_2, cipher=TLS\_ECDHE\_RSA\_WITH\_AES\_256\_GCM\_SHA384) id 15.20.3868.27; Wed, 17 Feb 2021 20:20:10 +0000Received: from BN8NAM12FT062.eop

**To:** Haefele, Robert

**Subject:** Re: EXTERNAL-Update

**Importance:** Normal

**Attachments:**

memo to haefele.docx

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Here is a brief memo on the deposition issue.

Free free to call us to discuss at 3:30. Or if this satisfies your concerns, skip the call.

We will of course keep trying to resolve this.

On Wed, Feb 17, 2021 at 2:18 PM Richard Sandza <[rs@martinmcmahonlaw.com](mailto:rs@martinmcmahonlaw.com)> wrote:

3:30 call us at 202-862-4343, they will patch you through.

On Wed, Feb 17, 2021 at 2:10 PM Haefele, Robert <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)> wrote:

Richard – What time today works. Sean and I will speak with you today. Please respond to both of us.

**Robert Haefele** | Attorney at Law | Motley Rice LLC  
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464  
o. 843.216.9184 | f. 843.216.9450 | [rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)

**From:** Richard Sandza <[rs@martinmcmahonlaw.com](mailto:rs@martinmcmahonlaw.com)>

**Sent:** Wednesday, February 17, 2021 1:51 PM

**To:** Haefele, Robert <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)>

**Subject:** Re: EXTERNAL-Update

Perhaps it would be good if we can talk about this.

What's a good time to call?

This afternoon can work. Tomorrow won't but Friday will.

On Wed, Feb 17, 2021 at 1:32 PM Haefele, Robert <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)> wrote:

Richard –

Thank you for letting us know. And similarly, we want to be transparent about our anticipation to not allow this to drag on due to a lack of responsiveness from Mr. Jelaidan or his representatives in Saudi Arabia. Please follow up with him and let us know if/when you learn of his availability. In the interim, we may have little choice but to bring the matter to the Court's attention again. If you view there to be a need to confer further on the matter (in the absence of

some word back from Saudi Arabia), please let us know.

Regards,

**Robert Haefele** | Attorney at Law | Motley Rice LLC  
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464  
o. 843.216.9184 | f. 843.216.9450 | [rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)

**From:** Richard Sandza <[rs@martinmcmahonlaw.com](mailto:rs@martinmcmahonlaw.com)>  
**Sent:** Wednesday, February 17, 2021 1:18 PM  
**To:** Haefele, Robert <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)>  
**Subject:** EXTERNAL-Update

Mr. Haefele,

In the interest of keeping you informed, I wish to advise you that we have not heard from counsel in Saudi Arabia. I called them this morning and no one picked up. I also emailed them.

I will try again tomorrow morning. As you know they are 8 hours ahead of us.

I will keep you posted on our progress.

Thank you.

--

**Richard Sandza, Esquire**

**Of Counsel**

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*Washington, DC 20006*

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202-862-4341

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**Richard Sandza, Esquire  
Of Counsel**

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